

EXHIBIT C

CLAIM CHARTS BASED ON PRELIMINARY INFRINGEMENT ANALYSIS
U.S. Patent No. 8,645,057

U.S. Patent No. 8,645,057 – Volvo Car Corporation and Volvo Car USA, LLC

Claim 10

Omnitek Partners LLC (“Omnitek”) provides evidence of infringement of claim 10 of U.S. Patent No. 8,224,057 (hereinafter “the ’057 patent”) by Volvo Car Corporation and Volvo Car USA, LLC (collectively “Volvo”). In support thereof, Omnitek provides the following claim charts.

“Accused Instrumentalities” as used herein refers to at least the following products and services: Volvo Sensus Navigation (*See* <https://www.volvocars.com/intl/why-volvo/human-innovation/future-of-driving/connectivity/sensus-navigation>), available on Volvo vehicles. The Volvo Sensus Navigation product line was introduced by at least 2013 (*See* <https://www.digitaltrends.com/car-reviews/2013-volvo-xc60-review/> and <https://www.jdpower.com/cars/volvo/new-2013-volvo>)(describing the Sensus navigation system found in a model year 2013 Volvo vehicle.) Therefore, the infringement has been occurring since at least that time. These claim charts demonstrate Volvo’s infringement, and provide notice of such infringement, by comparing each element of the asserted claims to corresponding components, aspects, and/or features of the Accused Instrumentalities. These claim charts are not intended to constitute an expert report on infringement. These claim charts include information provided by way of example, and not by way of limitation.

The analysis set forth below is based only upon information from publicly available resources regarding the Infringing Instrumentalities, as Volvo has not yet provided any non-public information. An analysis of Volvo’s (or other third parties’) technical documentation, and/or software source code, may assist in fully identify all infringing features and functionality. Accordingly, Omnitek reserves the right to supplement this infringement analysis once such information is made available to Omnitek. Furthermore, Omnitek reserves the right to revise this infringement analysis, as appropriate, upon issuance of a court order construing any terms recited in the asserted claims.

Unless otherwise noted, Omnitek contends that Volvo directly infringes the ’057 patent in violation of 35 U.S.C. § 271(a) by selling, offering to sell, making, using, and/or importing the Infringing Instrumentalities. The following exemplary analysis demonstrates that infringement. Unless otherwise noted, Omnitek further contends that the evidence below supports a finding of indirect infringement under 35 U.S.C. §§ 271(b) and/or (c), in conjunction with other evidence of liability under one or more of those subsections. Volvo makes, uses, sells, imports, or offers for sale in the United States, or has made, used, sold, imported, or offered for sale in the past, without authority, or induces others to make, use, sell, import, or offer for sale in the United States, or has induced others to make, use, sell, import, or offer for sale in the past, without authority products, equipment, or services that infringe claim 10 of the ’057 patent, including without limitation, the Accused Instrumentalities.

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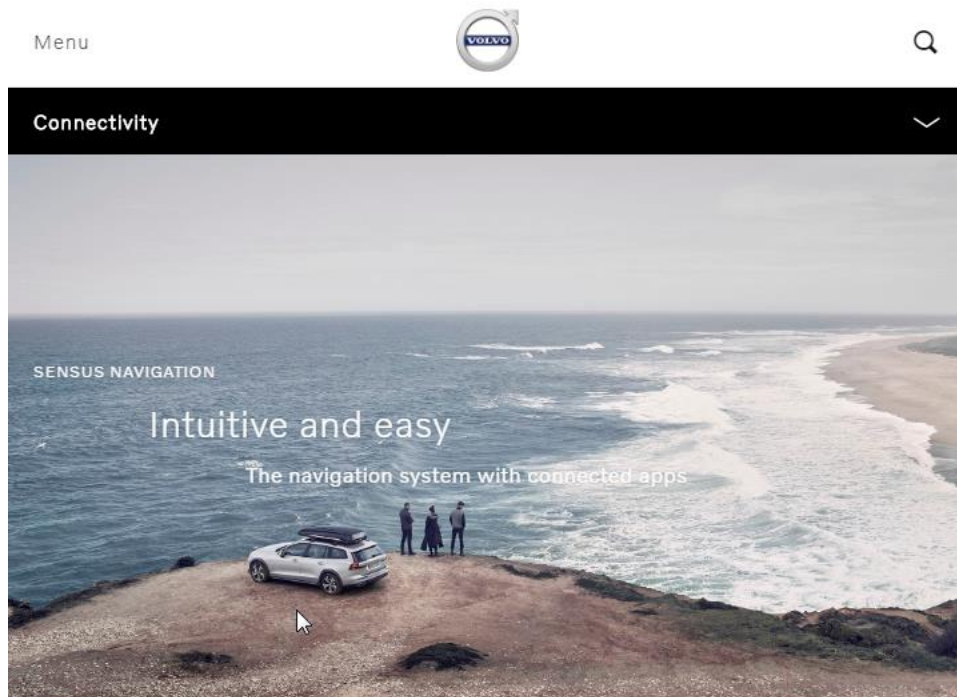
Unless otherwise noted, Omnitek believes and contends that each element of each claim asserted herein is literally met through Volvo's provision of the Infringing Instrumentalities. However, to the extent that Volvo attempts to allege that any asserted claim element is not literally met, Omnitek believes and contends that such elements are met under the doctrine of equivalents. More specifically, in its investigation and analysis of the Infringing Instrumentalities, Omnitek did not identify any substantial differences between the elements of the patent claims and the corresponding features of the Infringing Instrumentalities, as set forth herein. In each instance, the identified feature of the Infringing Instrumentalities performs at least substantially the same function in substantially the same way to achieve substantially the same result as the corresponding claim element.

To the extent the chart of an asserted claim relies on evidence about certain specifically-identified Accused Instrumentalities, Omnitek asserts that, on information and belief, any similarly-functioning instrumentalities also infringes the charted claim. Omnitek reserves the right to amend this infringement analysis based on other products made, used, sold, imported, or offered for sale by Volvo. Omnitek also reserves the right to amend this infringement analysis by citing other claims of the '057 patent, not listed in the claim chart, that are infringed by the Accused Instrumentalities. Omnitek further reserves the right to amend this infringement analysis by adding, subtracting, or otherwise modifying content in the "Accused Instrumentalities" column of each chart.

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Volvo Car Corporation - Sensus

Sensus Navigation is the fully integrated, connected navigation system that helps you get where you want to go as easily as possible. Helpful features include Send to Car, which allows you to send destinations to your car, either from your browser or through the Volvo On Call app. Sensus Navigation also gives you access to navigation-related services and apps that help you find new experiences and new places to go, in a way that's intuitive and easy to understand.

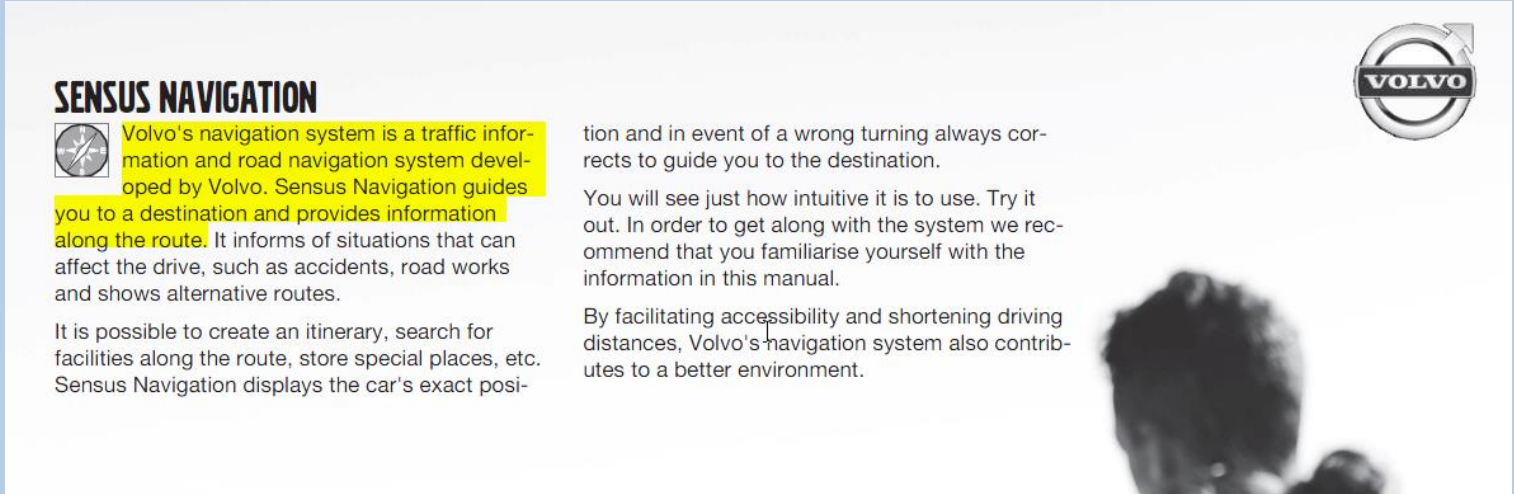


Sensus Navigation


Sensus Navigation is the fully integrated, connected navigation system that helps you get where you want to go as easily as possible. Helpful features include Send to Car, which allows you to send destinations to your car, either from your browser or through the Volvo On Call app. Sensus Navigation also gives you access to navigation-related services and apps that help you find new experiences and new places to go, in a way that's intuitive and easy to understand.

Source: <https://www.volvocars.com/intl/why-volvo/human-innovation/future-of-driving/connectivity/sensus-navigation>

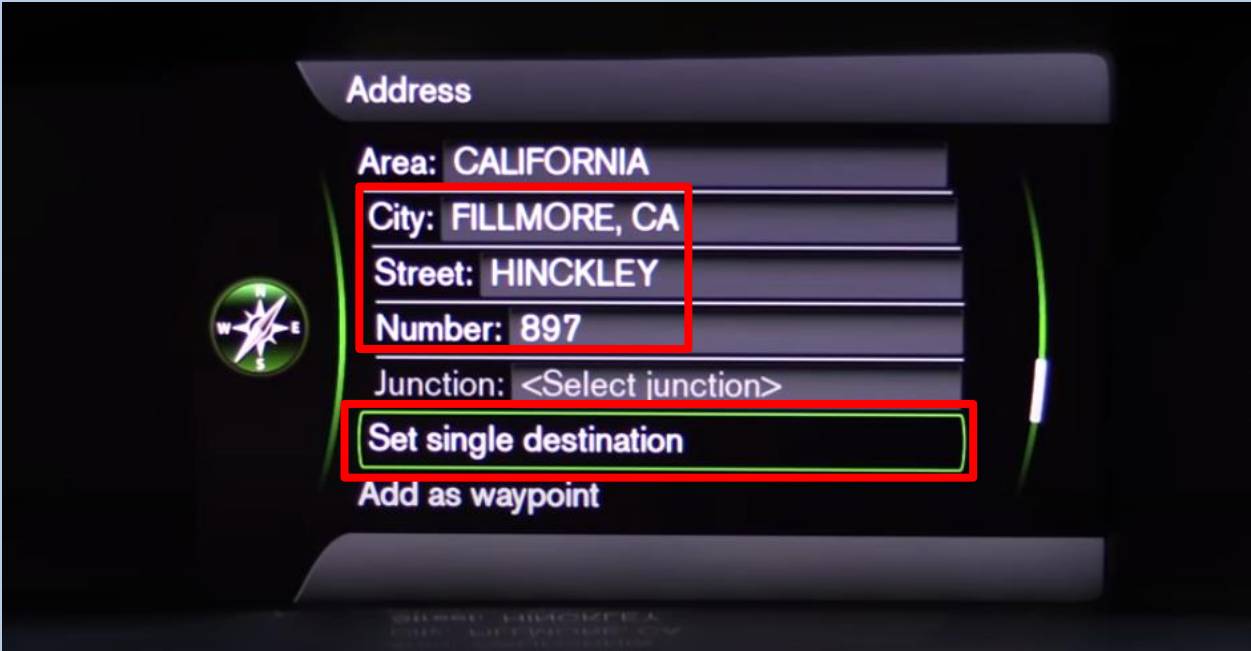
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U.S. Patent No. 8,645,057

Claim	US Patent 8,645,057	Description of the Infringement
Indep. Cl. 10 10-p	A method for electronically generating driving directions from a starting location to an ending location, the method comprising:	<p>Volvo integrates navigation functions for generating driving directions (electronically generating driving directions) in the Sensus multimedia system installed in their cars.</p> <div data-bbox="470 418 1974 909">  <p>SENSUS NAVIGATION</p> <p>Volvo's navigation system is a traffic information and road navigation system developed by Volvo. Sensus Navigation guides you to a destination and provides information along the route. It informs of situations that can affect the drive, such as accidents, road works and shows alternative routes.</p> <p>It is possible to create an itinerary, search for facilities along the route, store special places, etc. Sensus Navigation displays the car's exact position and in event of a wrong turning always corrects to guide you to the destination.</p> <p>You will see just how intuitive it is to use. Try it out. In order to get along with the system we recommend that you familiarise yourself with the information in this manual.</p> <p>By facilitating accessibility and shortening driving distances, Volvo's navigation system also contributes to a better environment.</p> </div> <p>Sensus Navigation WebEdition, pdf p. 3, https://www.manualslib.com/download/779801/Volvo-Sensus-Navigation.html</p>

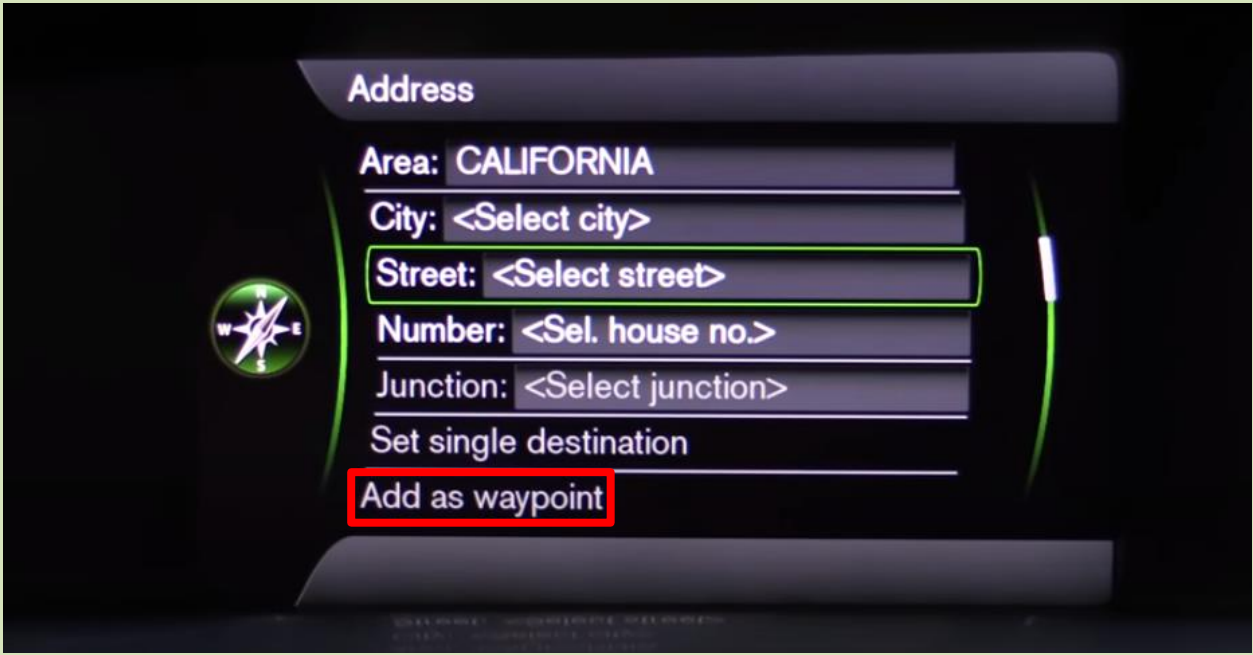
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U.S. Patent No. 8,645,057

Claim	US Patent 8,645,057	Description of the Infringement
		 <p>Source: 2015 Volvo Sensus Infotainment and Digital Instrument Cluster Review @7:12 https://www.youtube.com/watch?v=MHR55WnZ1yo</p>

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Claim	US Patent 8,645,057	Description of the Infringement
10-a	indicating the ending location;	<p>The Volvo Sensus Navigation system provides a menu to “Set single destination” (indicating an ending location).</p>  <p>Source: 2015 Volvo Sensus Infotainment and Digital Instrument Cluster Review @8:19 https://www.youtube.com/watch?v=MHR55WnZ1yo https://www.youtube.com/watch?v=KVLujeJ67N0 (annotations added)</p>

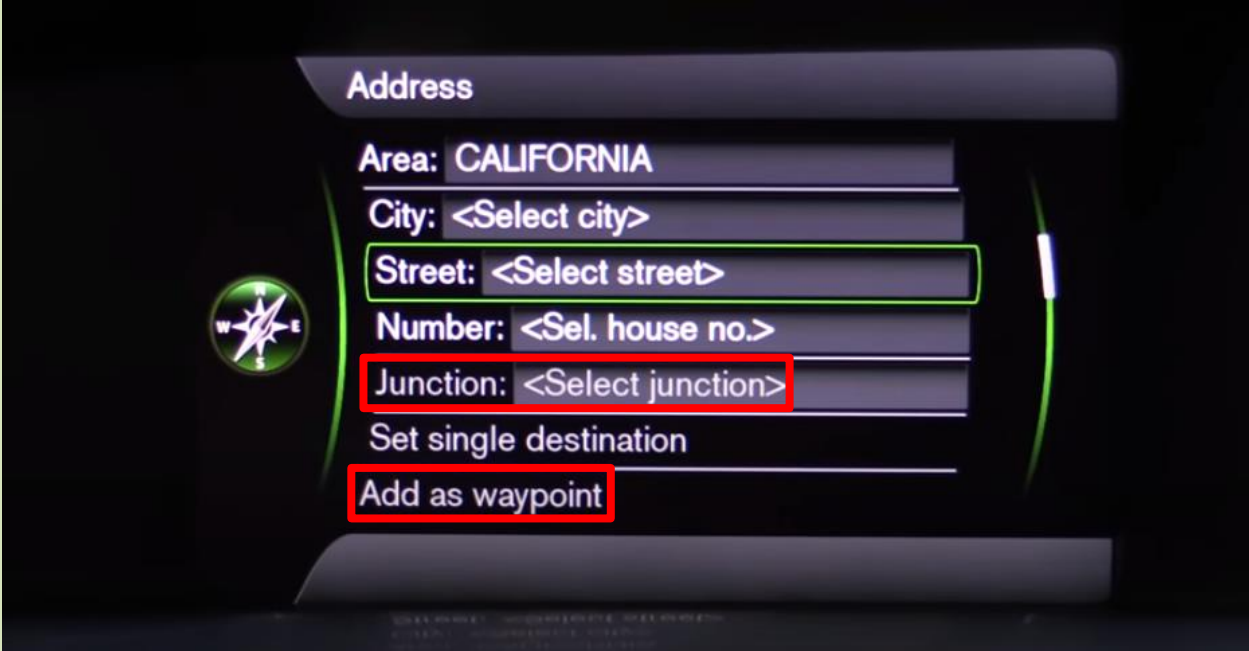
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Claim	US Patent 8,645,057	Description of the Infringement
10-b	indicating one or more preferences for the directions; and	<p>The Volvo Sensus Navigation system provides the ability to “add waypoints” (indicating one or more preferences for the directions).</p>  <p>The screenshot shows a navigation interface with a compass icon on the left. The main menu includes the following options: 'Address', 'Area: CALIFORNIA', 'City: <Select city>', 'Street: <Select street>', 'Number: <Sel. house no.>', 'Junction: <Select junction>', 'Set single destination', and 'Add as waypoint'. The 'Add as waypoint' option is highlighted with a red rectangular box. The 'Street' option is also highlighted with a green rectangular box.</p> <p>Source: 2015 Volvo Sensus Infotainment and Digital Instrument Cluster Review @7:31 https://www.youtube.com/watch?v=MHR55WnZ1yo https://www.youtube.com/watch?v=KVlujeJ67N0 (annotations added)</p>

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Claim	US Patent 8,645,057	Description of the Infringement
10-c	generating driving directions based on the indicated starting address, ending address, and one or more preferences;	<p>The Volvo Sensus Navigation system “Calculates route” (generating driving directions based on the indicated starting address, ending address, and one or more preferences).</p>  <p>Source: 2015 Volvo Sensus Infotainment and Digital Instrument Cluster Review @8:21 https://www.youtube.com/watch?v=MHR55WnZ1yo https://www.youtube.com/watch?v=KVLujeJ67N0 (annotations added)</p>

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Claim	US Patent 8,645,057	Description of the Infringement
10-d	wherein at least one of the one or more preferences comprises an indication to generate driving directions that include a named road or highway.	<p>The Volvo Sensus Navigation can include a Junction (named road) as a waypoint (preference) in the driving directions.</p>  <p>Source: 2015 Volvo Sensus Infotainment and Digital Instrument Cluster Review @7:31 https://www.youtube.com/watch?v=MHR55WnZ1yo https://www.youtube.com/watch?v=KVlujeJ67N0 (annotations added)</p>

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		<ul style="list-style-type: none"> • Junction: - Select destination based on two intersecting streets/roads. • Set single destination - Deletes any previous destination in the itinerary and starts guidance to the current destination. • Add as waypoint - Select + OK to add the address to the itinerary. • Information - Select + OK to view information about the selected destination. <p>Sensus Navigation WebEdition, pdf p. 45, https://www.manualslib.com/download/779801/Volvo-Sensus-Navigation.html</p>

Caveat: The notes and/or cited excerpts utilized herein are set forth for illustrative purposes only and are not meant to be limiting in any manner. For example, the notes and/or cited excerpts, may or may not be supplemented or substituted with different excerpt(s) of the relevant reference(s), as appropriate. Further, to the extent any error(s) and/or omission(s) exist herein, all rights are reserved to correct the same.